

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EDWARD CARMONA, §
Plaintiff §
v. § CIVIL ACTION NO. A-06-CA-641-SS
SOUTHWEST AIRLINES COMPANY, §
Defendant §
§

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Pursuant to this Court's Order of September 7, 2008, plaintiff submits the following proposed voir dire questions:

1. Does anyone know any of the lawyers or parties involved in this case?
2. Has anyone here ever been represented by any of the law firms involved in this case?
3. Has your employer or spouse's employer ever been represented by any of the law firms involved in this case?
4. Does anyone know anyone who has ever worked for Southwest Airlines?
5. Does anyone know anyone who has ever worked for Southwest Airlines?
6. Does anyone have an opinion of Southwest Airlines that is generally positive and that they believe might possibly influence their decision in this case?
7. Has anyone here ever been accused of discrimination?
8. Has anyone here ever been accused of discriminating against someone or retaliating against someone at work?
9. Has anyone's spouse, friend, or close family member ever been accused of discrimination? How has that experience affected your views of lawsuits in general?

10. Has anyone ever been a member of, or donated money to, or been any part of any organization that seeks to limit the amount of lawsuits filed? Who here views such organizations in a positive light?
11. Has anyone here ever been a defendant in a lawsuit?
12. Has anyone's spouse, friend or close family member ever been a defendant in a lawsuit? How has that experience affected your views of lawsuits in general?
13. Has anyone here ever been in a position in which they managed employees and had to make decisions regarding disciplining employees? What was your position and for what company?
14. Has anyone here ever terminated an employee? If so, what were the reasons?
15. Has anyone here ever worked in the HR department for a company? What company?
16. Has anyone's spouse or close family member ever worked in the HR department for a company?
17. Has anyone here ever been involved in an investigation regarding an accusation of discrimination? Please describe your involvement and the results.
18. Is there anyone here who believes that in order for a plaintiff to prevail in a lawsuit, they should have to prove their case beyond a reasonable doubt?
19. Does anyone here believe that laws governing discrimination in the workplace have gone a little bit too far?
20. Does anyone here believe that punitive damages have gone too far?
21. Who here believes that certain employees are too quick to make discrimination complaints?
22. Has anyone ever served on a civil jury? Were you the foreperson? What type of case was it and what was the result?
23. Has anyone here ever been falsely accused of discrimination? What happened as a result?

Respectfully submitted,

MELTON & KUMLER, L.L.P.
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/s/ John F. Melton

John F. Melton
State Bar No. 240113155

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

By my signature hereunder affixed, I certify that a true and correct copy of the foregoing document has been transmitted to all parties of record **via hand delivery during the Court's docket call**, on this 26th day of September, 2008, addressed as follows:

Lacey L. Gourley
Bracewell & Giuliani, L.L.P.
111 Congress Avenue, Suite 2300
Austin, Texas 78701-4061

/s/ John F. Melton

John F. Melton